

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DANIEL DYMTROW,)	
)	
Plaintiff,)	
)	Civil Action No. 07 CV 11277 (RJS)
)	
v.)	
)	
TAYLOR SWIFT, SCOTT SWIFT and)	
ANDREA SWIFT,)	
Defendants.)	

NOTICE OF MOTION TO DISMISS THE COMPLAINT

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Transmittal Declaration of Paul V. LiCalsi, Defendants Taylor Swift, Scott Swift and Andrea Swift move this Court before the Honorable Richard J. Sullivan, United States District Court Judge for the Southern District of New York, for an order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing the Complaint in its entirety with prejudice.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1, any papers in opposition to this Motion are to be served within ten (10) business days after service of the moving papers.

DATED: March 20, 2008
New York, New York

MITCHELL SILBERBERG & KNUPP LLP

By:



Paul V. LiCalsi (PL-6622)
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Scott Swift and Andrea Swift*

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CERTIFICATE OF SERVICE

I, Paul V. LiCalsi, hereby certify that on March 20, 2008, a true and correct copy of:

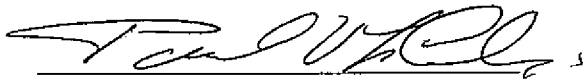
- NOTICE OF MOTION TO DISMISS THE COMPLAINT
- MEMORANDUM OF LAW IN SUPPORT OF MOTION TO DISMISS THE COMPLAINT
- TRANSMITTAL DECLARATION OF PAUL V. LICALSI IN SUPPORT OF DEFENDANTS TAYLOR SWIFT, SCOTT SWIFT AND ANDREA SWIFT'S MOTION TO DISMISS THE COMPLAINT

was electronically served upon counsel of record via the Court's Electronic Filing System

in accordance with the Federal Rules of Civil Procedure and Local Civil Rule 5.2.

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